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**BEFORE THE
BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**VERONICA LARA, a.k.a. VERONICA
LARA DAVALOS, a.k.a. VERONICA
LOPEZ
1707 Cherokee Drive
Salinas, CA 93906**

**Marriage and Family Therapist Intern
Registration No. IMF 64508**

Respondent.

Case No. IM-2013-1256

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

FINDINGS OF FACT

1. On or about July 10, 2014, Complainant Kim Madsen, in her official capacity as the Executive Officer of the Board of Behavioral Sciences, Department of Consumer Affairs, filed Accusation No. IM-2013-1256 against Veronica Lara, also known as Veronica Lara Davalos, also known as Veronica Lopez (“Respondent”) before the Board of Behavioral Sciences. (Accusation attached as Exhibit A.)

1 2. On or about September 2, 2010, the Board of Behavioral Sciences (“Board”) issued
2 Marriage and Family Therapist Intern Registration No. IMF 64508 to Respondent. The Marriage
3 and Family Therapist Intern Registration expired on September 30, 2013, and has not been
4 renewed.

5 3. On or about August 18, 2014, Respondent was served by Certified Mail copies of the
6 Accusation No. IM-2013-1256, Statement to Respondent, Notice of Defense, Request for
7 Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6, and 11507.7) at
8 Respondent’s address of record which, pursuant to Business and Professions Code section 136, is
9 required to be reported and maintained with the Board. Respondent’s address of record was and
10 is: 1707 Cherokee Drive, Salinas, CA 93906.

11 4. Service of the Accusation was effective as a matter of law under the provisions of
12 Government Code section 11505, subdivision (c) and Business & Professions Code section 124.

13 5. Government Code section 11506 states, in pertinent part:
14 (c) The respondent shall be entitled to a hearing on the merits if the respondent
15 files a notice of defense, and the notice shall be deemed a specific denial of all parts
16 of the accusation not expressly admitted. Failure to file a notice of defense shall
constitute a waiver of respondent’s right to a hearing, but the agency in its discretion
may nevertheless grant a hearing.

17 6. Respondent failed to file a Notice of Defense within 15 days after service upon her of
18 the Accusation, and therefore waived her right to a hearing on the merits of Accusation No. IM-
19 2013-1256.

20 7. California Government Code section 11520 states, in pertinent part:
21 (a) If the respondent either fails to file a notice of defense or to appear at the
22 hearing, the agency may take action based upon the respondent’s express admissions
or upon other evidence and affidavits may be used as evidence without any notice to
23 respondent.

24 8. Pursuant to its authority under Government Code section 11520, the Board finds
25 Respondent is in default. The Board will take action without further hearing and, based on the
26 relevant evidence contained in the Default Decision Evidence Packet in this matter, as well as
27 taking official notice of all the investigatory reports, exhibits and statements contained therein on
28 file at the Board’s offices regarding the allegations contained in Accusation No. IM-2013-1256,

1 finds that the charges and allegations in Accusation No. IM-2013-1256, are separately and
2 severally, found to be true and correct by clear and convincing evidence.

3 9. Taking official notice of its own internal records, pursuant to Business and
4 Professions Code section 125.3, it is hereby determined that the reasonable costs for Investigation
5 and Enforcement are \$2,147.50 as of September 29, 2014.

6 DETERMINATION OF ISSUES

7 1. Based on the foregoing findings of fact, Respondent Veronica Lara, also known as
8 Veronica Lara Davalos, also known as Veronica Lopez has subjected her Marriage and Family
9 Therapist Intern Registration No. IMF 64508 to discipline.

10 2. The agency has jurisdiction to adjudicate this case by default.

11 3. The Board of Behavioral Sciences is authorized to revoke Respondent's Marriage and
12 Family Therapist Intern Registration based upon the following violations alleged in the
13 Accusation which are supported by the evidence contained in the Default Decision Evidence
14 Packet in this case:

15 a. Conviction of a crime substantially related to the qualifications, duties, or functions of
16 a licensee (Bus. & Prof. Code, § 4982, subd. (a));

17 b. Commission of a dishonest act (Bus. & Prof. Code, § 4982, subd. (j));

18 c. Unprofessional conduct (Bus. & Prof. Code, § 4982).

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Exhibit A

Accusation

1 KAMALA D. HARRIS
Attorney General of California
2 DIANN SOKOLOFF
Supervising Deputy Attorney General
3 SUSANA A. GONZALES
Deputy Attorney General
4 State Bar No. 253027
1515 Clay Street, 20th Floor
5 P.O. Box 70550
Oakland, CA 94612-0550
6 Telephone: (510) 622-2221
Facsimile: (510) 622-2270
7 *Attorneys for Complainant*

8 **BEFORE THE**
BOARD OF BEHAVIORAL SCIENCES
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. IM-2013-1256

12 **VERONICA LARA, a.k.a. VERONICA**
13 **LARA DAVALOS, a.k.a. VERONICA**
LOPEZ

A C C U S A T I O N

14 **1728 Cherokee Drive**
Salinas, CA 93906

15 **Marriage and Family Therapist Intern**
16 **Registration No. IMF 64508**

17 Respondent.

18
19 Complainant alleges:

20 PARTIES

21 1. Kim Madsen (Complainant) brings this Accusation solely in her official capacity as
22 the Executive Officer of the Board of Behavioral Sciences, Department of Consumer Affairs.

23 2. On or about September 2, 2010, the Board of Behavioral Sciences issued Marriage
24 and Family Therapist Intern Registration Number IMF 64508 to Veronica Lara, also known as
25 Veronica Lara Davalos, also known as Veronica Lopez (Respondent). The Marriage and Family
26 Therapist Intern Registration expired on September 30, 2013, and has not been renewed.

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1 guilty, or setting aside the verdict of guilty, or dismissing the accusation, information, or
2 indictment.”

3 . . .

4 “(j) The commission of any dishonest, corrupt, or fraudulent act substantially related to the
5 qualifications, functions, or duties of a licensee or registrant.”

6 6. California Code of Regulations, title 16, section 1812, states:

7 “For purposes of denial, suspension, or revocation of a license or registration pursuant to
8 Division 1.5 (commencing with Section 475) of the Code, a crime or act shall be considered to be
9 substantially related to the qualifications, functions or duties of a person holding a license under
10 Chapters 13, 13.5, 14, and 16 of Division 2 of the Code if to a substantial degree it evidences
11 present or potential unfitness of a person holding a license to perform the functions authorized by
12 his or her license in a manner consistent with the public health, safety or welfare.”

13 COST RECOVERY

14 7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
15 administrative law judge to direct a licentiate found to have committed a violation or violations of
16 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
17 enforcement of the case.

18 FIRST CAUSE FOR DISCIPLINE

19 (Conviction of Substantially Related Crime)

(Bus. & Prof. Code, § 4982, subd. (a))

20 8. Respondent has subjected her intern registration to disciplinary action in that she was
21 convicted of a crime substantially related to the qualifications, functions, or duties of licensee, as
22 defined in California Code of Regulations, title 16, section 1812. (Bus. & Prof. Code, § 4982,
23 subd. (a).) Specifically, on or about December 19, 2012, in a criminal matter entitled “*The People*
24 *of the State of California v. Veronica Lara*,” in the Monterey County Superior Court, Case No.
25 MS309267A, Respondent was convicted by plea of nolo contendere of theft of personal property
26 from Kohl’s Department Store, a misdemeanor (Penal Code, § 484, subd. (a).) Respondent was
27 placed on probation for three years, ordered to stay away from Kohl’s Department store in
28

1 Salinas, California, report and enroll in the Theft Offender Program, ordered to serve five days in
2 Monterey County Jail, or alternatively to participate in the Work Alternative Program.

3 SECOND CAUSE FOR DISCIPLINE

4 (Commission of a Dishonest Act)
5 (Bus. & Prof. Code, § 4982, subd. (j))

6 9. Respondent has subjected her intern registration to disciplinary action in that she
7 committed a dishonest act substantially related to the qualifications, functions, or duties of a
8 licensee, as defined in California Code of Regulations, title 16, section 1812. (Bus. & Prof. Code,
9 § 4982, subd. (j).) Specifically, on or about November 23, 2012, Respondent was cited by the
10 Salinas Police Department for theft at Kohl's Department store in Salinas, California. She was
11 subsequently convicted of theft of personal property as set forth in paragraph 8, above.

12 THIRD CAUSE FOR DISCIPLINE

13 (Unprofessional Conduct)
14 (Bus. & Prof. Code, § 4982)

15 10. Respondent has subjected her intern registration to disciplinary action in that she
16 engaged in unprofessional conduct. (Bus. & Prof. Code, § 4982.) The circumstances are set forth
17 in paragraphs 8 and 9, above.

18 DISCIPLINARY CONSIDERATIONS

19 11. To determine the degree of discipline, if any, to be imposed on Respondent,
20 Complainant alleges that on or about September 5, 1990, Respondent was declared a ward of the
21 Juvenile Court of Monterey County based upon her violation of Penal Code section 484,
22 subdivision (a) (theft), a misdemeanor. Respondent was placed on regular terms and conditions
23 of probation and ordered to complete the Placement Program. On February 11, 1992, placement
24 was rescinded and Wardship Probation was terminated.

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PRAYER

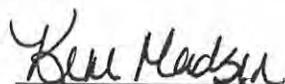
WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this Accusation, and that following the hearing, the Board of Behavioral Sciences issue a decision:

1. Revoking or suspending Marriage and Family Therapist Intern Registration Number IMF 64508, issued to Veronica Lara, also known as Veronica Lara Davalos, also known as Veronica Lopez;

2. Ordering Respondent to pay the Board of Behavioral Sciences the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and

3. Taking such other and further action as deemed necessary and proper.

DATED: July 10, 2014



KIM MADSEN
Executive Officer
Board of Behavioral Sciences
Department of Consumer Affairs
State of California
Complainant

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